



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

Site: Murphy Ave Drum
Break: 11.9 v. 38
Other: _____

INFORMATION REQUEST LETTER
URGENT LEGAL MATTER - PROMPT REPLY REQUESTED
CERTIFIED MAIL - RETURN RECEIPT REQUESTED

JAN 06 2000

Our Way Company
Mr. Don Hood
4452 Bibb Blvd.
Tucker, GA 30084

SUBJ:

Request for Information Pursuant to Section 104 of CERCLA and Section 3007 of RCRA for Murphy Avenue Drum Site in Atlanta, Fulton County, Georgia

Dear Mr. Hood:

This letter seeks your cooperation in providing information and documents relating to the contamination of the Murphy Avenue Drum Superfund Site in Atlanta, Fulton County, Georgia (the Site). A Superfund site is a site contaminated with high levels of hazardous substances that may present a threat to human health or the environment. We encourage you to give this matter your immediate attention and request that you provide a complete and truthful response to this Information Request and attached questions (Enclosure C) within thirty (30) days of your receipt of this letter.

The United States Environmental Protection Agency ("EPA") is investigating the release or threat of release of hazardous substances, pollutants, or contaminants at the Site. EPA is seeking to obtain information concerning the generation, storage, treatment, transportation, and disposal methods of such substances that have been or threaten to be released from the Site. EPA will study the effects of these substances on the environment and public health. In addition, EPA will identify activities, materials and parties that contributed to contamination at the Site. EPA believes that you might have information which may assist the Agency in its investigation of the Site.

On June 3, 1997, EPA determined that the presence of hazardous substances discovered at the Murphy Avenue Drum Superfund Site (the Site) posed a treat to human health and the environment. There were significantly high levels of sulfides, cyanides and peroxides at the Site. From June 3, 1997 through April of 1998, EPA tested, bulked and removed the drums, tires, and debris from the site. EPA also emptied and removed underground storage tanks from the Site. The site was then restored, cleaned and the excavated soil was re-filled with clean soil. EPA used public funds to perform the site investigation and removal activities. EPA spent \$368,835.70 to clean up the Site.

EPA found a set of rolodex cards at the Site. These cards are an apparent list of customers

Internet Address (URL) • <http://www.epa.gov>

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 25% Postconsumer)



10609529

of Mr. Blackshear or of the Site. Your company's name appeared in one of the cards. EPA believes you may have been involved with the Site or with Mr. Blackshear. As such, your company may have information which could assist us in the investigation of the Site.

Description of Legal Authority

The federal "Superfund" law (the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. Section 9601, et seq. commonly referred to as "CERCLA" and "Superfund") gives EPA the authority to, among other things: (1) assess contaminated sites, (2) determine the threats to human health and the environment posed by each site, and (3) clean up those sites in the order of the relative threats posed by each.

Information Request

Under Section 104(e)(2) of CERCLA, 42 U.S.C. Section 9604(e)(2), EPA has broad information gathering authority which allows EPA to require persons to furnish information or documents relating to:

- (A) The identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility or transported to a vessel or facility.
- (B) The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility.

While EPA seeks your cooperation in this investigation, compliance with the Information Request is required by law. Please note that false, fictitious, or fraudulent statements or representations may subject you to civil or criminal penalties under federal law.

Some of the information EPA is requesting may be considered by you to be confidential. Please be aware that you may not withhold the information upon that basis. If you wish EPA to treat the information confidentially, you must advise EPA of that fact by following the procedures outlined in Enclosure A, including the requirement for supporting your claim for confidentiality.

If you have information about other parties who may have information which may assist the Agency in its investigation of the Site or may be responsible for the contamination at the Site, that information should be submitted within the time-frame noted above.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501 et seq.

Instructions on how to respond to the questions in Enclosure C to this document are described in Enclosure A. If you or your attorney have legal questions about this request, or

about how to respond, please contact Ms. Lucia C. Mendez, at (404)562-9637. Your response to this Information Request should be mailed to:

Ms. Lucia C. Mendez
Assistant Regional Counsel
Environmental Accountability Division
U.S. Environmental Protection Agency- Region 4
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8909

If you have additional questions about the history of the Site, the nature of the environmental conditions at the Site, or the status of cleanup activities, please contact Ms. Janice Thomas, Program Services Branch Waste Management Division at 404-562-8895.

We appreciate and look forward to your prompt response to this information request.

Sincerely,



Lucia C. Mendez
Assistant Regional Counsel
Environmental Accountability Division

Enclosure

cc: Janice Thomas
Program Services Branch

MURPHY AVENUE DRUM, ATLANTA, GA

MURPHY AVENUE DRUMS
ENCLOSURE A

FIRST INFORMATION REQUEST

Instructions

1. Answer Every Question Completely.

A separate response must be made to each of the questions set forth in this Information Request. For each question contained in this letter, if information responsive to this information request is not in your possession, custody, or control, please identify the person(s) from whom such information may be obtained.

2. Number Each Answer.

Precede each answer with the corresponding number of the question and the subpart to which it corresponds.

3. Provide the Best Information Available.

Provide responses to the best of Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent will be considered non-compliance with this Information Request.

4. Identify Sources of Answer.

For each question, identify (see Definitions) all the persons and documents that you relied on in producing your answer.

5. Continuing Obligation to Provide/Correct Information.

If additional information or documents responsive to this Request become known or available to you after you respond to this Request, EPA hereby requests pursuant to CERCLA Section 104(e) that you supplement your response to EPA.

6. Confidential Information.

The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42

U.S.C. Sections 9604(e)(7)(E) and (F), and Section 3007(b) of RCRA, 42 U.S.C. Section 6927(b), and 40 C.F.R. Section 2.203(b).

If you make a claim of confidentiality for any of the information you submit to EPA, you must prove that claim. For each document or response you claim confidential, you must separately address the following points:

1. the portions of the information alleged to be entitled to confidential treatment;
2. the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);
3. measures taken by you to guard against the undesired disclosure of the information to others;
4. the extent to which the information has been disclosed to others, and the precautions taken in connection therewith;
5. pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and
6. whether you assert that disclosure of the information would likely result in substantial harmful effects on your business' competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.

To make a confidentiality claim, please stamp, or type, "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise non-confidential documents should be clearly identified. You should indicate a date, if any, after which the information need no longer be treated as confidential. Please submit your response so that all non-confidential information, including any redacted versions of documents are in one envelope and all materials for which you desire confidential treatment are in another envelope.

All confidentiality claims are subject to EPA verification. It is important that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, and that it is not and has not been obtainable by legitimate means without your consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by CERCLA Section 104(e). If no such claim accompanies the information when it is received by EPA, then it may be made available to the public by EPA without further notice to you.

7. Disclosure to EPA Contractor.

Information which you submit in response to this Information Request may be disclosed by EPA to authorized representatives of the United States, pursuant to 40 C.F.R. 2.310(h), even if you assert that all or part of it is confidential business information. Please be advised that EPA intends to disclose all responses to this Information Request to one or more of its private contractors for the purpose of organizing and/or analyzing the information contained in the responses to this Information Request. If you are submitting information which you assert is entitled to treatment as confidential business information, you may comment on this intended disclosure within fourteen (14) days of receiving this Information Request.

8. Personal Privacy Information.

Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."

9. Objections to Questions.

If you have objections to some or all the questions within the Information Request letter, you are still required to respond to each of the questions.

MURPHY AVENUE DRUMS
ENCLOSURE B

Definitions

The following definitions shall apply to the following words as they appear in this Supplemental Information Request.

1. The term "you" or "Respondent" shall mean your company, Our Way Company. The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of the estate.
2. The term "person" shall include any individual, firm, corporation, association, partnership, consortium, joint venture, commercial entity, United States Government, State, municipality, commission, political subdivision of a State, or any interstate body.
3. The term "The Site" shall mean the Murphy Avenue Drum Superfund Site located at 1230 Murphy Avenue, Atlanta, Fulton County, Georgia.
4. The term "waste" or "wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
5. The term "hazardous substance" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
6. The term "hazardous waste" shall have the same definition as that contained in Section 1004(5) of RCRA.
7. The term "solid waste" shall have the same definition as that contained in Section 1004(27) of RCRA.
8. The term "identify" means, with respect to a natural person, to set forth: (a) the person's full name; (b) present or last known business and home addresses and telephone numbers; (c) present or last known employer (include full name and address) with title, position or business.
9. With respect to a corporation, partnership, or other business entity (including a sole proprietorship), the term "identify" means to provide its full name, address, and affiliation with the individual and/or company to whom/which this request is addressed.
10. The term "identify" means, with respect to a document, to provide its customary business

description, its date, its number, if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or the subject matter.

11. The term "documents" includes any written, recorded, computer generated, or visually or aurally reproduced material of any kind in any medium in your possession, custody, or control or known by you to exist, including originals, all prior drafts, and all non-identical copies. These may include by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreement and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intraoffice communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc or disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which it produces, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document, and (e) every document referred to in any other document.

12. The term "arrangement" means every separate contract or other agreement between two or more persons, whether written or oral.

13. The term "material" or "materials" shall mean any and all objects, goods, substances, or matter of any kind, that have been generated, treated, stored, or disposed of or otherwise handled at or transported to the Site, including but not limited to, all hazardous substances, pollutants and contaminants, hazardous wastes and solid wastes, as defined above.

14. The term "hazardous material" shall mean all hazardous substances, pollutants or contaminants, and hazardous wastes, as defined above.

15. The term "non-hazardous material" shall mean all material as defined above, excluding hazardous substances, pollutants and contaminants, and hazardous waste.

16. The term "real estate" shall mean and include, but not be limited to the following: land, buildings, a house, dwelling place, condominium, cooperative apartment, office or commercial building, including those located outside the United States.

17. The term "release" shall mean any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment, including the abandonment or discharging of barrels, containers and other closed receptacles containing any

hazardous substance or pollutant or contaminant.

18. The term "pollutant or contaminant" shall include, but not be limited to, any element, substance, compound, or mixture, including disease-causing agents, which after release into the environment will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunctions in reproduction) or physical deformations; except that the term "pollutant or contaminant" shall not include petroleum.

19. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.

20. The term "arrangement" means every separate contract or other agreement between two or more persons.

21. The terms "transaction" or "transact" mean any sale, transfer, giving, delivery, change in ownership, or change in possession.

22. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.

23. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 C.F.R. Part 300, or 40 C.F.R. Parts 260-280, in which case the statutory or regulatory definitions shall apply.

24. The term "property interest" means any interest in property including but not limited to, any ownership interest, including an easement, any interest in the rental of property, any interest in a corporation that owns or rents or owned or rented property, and any interest as either the trustee or beneficiary of a trust that owns or rents, or owned or rented property.

25. The term "asset" shall include the following: real estate, buildings or other improvements of real estate, equipment, vehicles, furniture, inventory, supplies, customer lists, accounts receivable, interest in insurance policies, interests in partnerships, corporations and unincorporated companies, securities, patents, stocks, bonds, and other tangible as well as intangible property.

MURPHY AVENUE DRUMS
ENCLOSURE C

Questions

1. Identify the person(s) answering these questions on behalf of Respondent.
2. For each and every question contained herein, identify all persons consulted in the preparation of the answer.
3. For each and every question contained herein, identify all documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to the question and provide true and accurate copies of all such documents.
4. Describe your company's operations in general terms noting specifically all raw materials, chemicals, solvents, metals, pesticides, and oils used or produced, and the end products manufactured or produced. Also describe the types of production processes employed during the past ten years.
5. Describe the nature of your company's business with "the Site", and/or Mr. Blackshear?
- (6) Who was your business contact at the Site and what was his or her title?
 - (A) Did your company provide services or products to the Site? If so, please specify their nature.
 - (B) What type of services did the Site provide to your company?
 - (D) For what period of time did your company do business with the Site?
6. (A) Has your company ever sold, given or sent drums to, or have drums reconditioned at the Site?
 - (B) If yes, please describe:
 - (1) How your company used or employed the drums;
 - (2) the contents of the drums when the drums were sold, given or sent to, or reconditioned at the Site;
 - (3) The date(s) of the transaction(s);
 - (4) The number of drums or containers involved and the amount of contents (in gallons, if possible).
 - (5) Identify the transporter or hauler of the drums, hazardous substances or waste and the method of transportation.

(6) If your company was the transporter of the drums to the Site, please identify how the drums or wastes came into your company's care. (For example, contract for disposal with another company.) Please provide the following information.

(A) Provide the name, address and phone number of the company from which you picked up the drums.

(B) Specify what type of arrangement you had with the company which generated the drums. Provide any logs or transportation manifests of these transactions.

(7) provide copies of any and all documents which in any way pertain to your company's transactions with the Site, or Mr. Blackshear.

7. Identify all persons, including you, or your employees, agents, or representatives who have:

a. disposed of or treated drums containing any amount of materials at the Site. If the drums disposed off were sent empty, specify this also.

b. arranged for the disposal or treatment of drums containing any amount or no amount of materials at the Site; or

c. arranged for the transportation of drums containing any amount of materials to the Site for disposal or treatment. If the drums were empty, please specify this also.

8. Please identify any hazardous material/waste streams generated your company and all raw products used by such facility, during 1995 through 1997. Also, please identify the disposal process for each identified waste stream.

9. Provide copies of financial statements, reports, or projections prepared by, for or on behalf of the Respondent for the past five years.

10. Identify all persons who may be responsible for the liabilities of Respondent arising from or relating to the release or threatened release of hazardous substances at the Site, including but not limited to successors and individuals.

11. (A) Did any of the drums which your company sold, gave, sent to, exchanged at, or had reconditioned by the Site, and/ or Mr. Blackshear contain hazardous substances, as that term is defined in Section 101(14) of CERCLA, 42 U.S.C. § 9601 (14)?

(B) If yes, provide the following information:

(1) State when the drums of hazardous substances were sold, given, sent to, exchanged at, or reconditioned at the Site;

(2) Identify the contents of the drums before they were sold, given, sent, exchanged, or reconditioned and their contents when they were sold, given, sent, exchanged, or reconditioned, noting specifically the type of waste or hazardous substance (e.g., chemical waste, pesticide residue, used auto or truck crankcase oil), the constituents of the contents of the drums, the characteristics of the wastes (e.g., corrosive, reactive, ignitable, TCPL), and the origin of contents of the drums, hazardous waste or hazardous substances (e.g., from equipment wash-down, process sludge);

(3) State the number of drums and the volume of each waste or hazardous substance in each drum (in gallons if possible) which were sold, given, sent, exchanged, or reconditioned;

(4) Provide copies of any and all documents which in any way pertain to your company's drum transactions with the Site or with Mr. Blackshear.

(5) Identify the generator, transporter, or hauler of the drums, hazardous substances or waste and the method of transportation.

12. (A) Describe in detail any procedures employed to rinse, clean, or empty the drums prior to sending them to the Site.

13. Describe the amount of residue typically remaining in any such drums which were rinsed, cleaned, or emptied prior to being sent to the Site.

14. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

15. List any hazardous wastes which may result from your manufacturing of process. Specify how these hazardous wastes are or were disposed off. Please list all companies used to transport the waste off your plant.

16. Please list any corrosives which you sent to disposal facilities for the periods of 1995-1997. Please list the waste, its chemical composition and the name address and phone of the disposal facility. Also specify the time periods you were sending wastes to the individual facilities.

17. Please provide a copy of your shipping manifests for the years 1995-1997.

18. Please list the names and job titles of the person(s) in charge of supervising, and/or monitoring the handling of hazardous wastes at your company.

19. Please list any wastes you send to be recycled. Include its chemical composition, and the name, address and phone of the recycling facility. Specify time periods during which wastes were delivered to the Site.

20. Please supply us with the list of shipping companies you employ to transport hazardous wastes. List the name, address, phone number and contact person at the company. Also, provide the disposal profile for your hazardous wastes.

21. Please identify the brand, color, capacity and type of drum used to dispose off wastes by your company. Also, describe any company logo and product information which may be found in your drums.



Office of Enforcement and Compliance Assurance
INFORMATION SHEET

U.S. EPA Small Business Resources

If you own a small business, the United States Environmental Protection Agency (EPA) offers a variety of compliance assistance and tools to assist you in complying with federal and State environmental laws. These resources can help you understand your environmental obligations, improve compliance and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies.

EPA Websites

EPA has several Internet sites that provide useful compliance assistance information and materials for small businesses. Many public libraries provide access to the Internet at minimal or no cost.

EPA's Small Business Home Page (<http://www.epa.gov/sbo>) is a good place to start because it links with many other related websites. Other useful websites include:

EPA's Home Page
<http://www.epa.gov>

Small Business Assistance Programs
<http://www.epa.gov/ttn/sbap>

Compliance Assistance Home Page
<http://www.epa.gov/oeca/oc>

Office of Site Remediation Enforcement
<http://www.epa.gov/oeca/osre>

Hotlines, Helplines and Clearinghouses

EPA sponsors approximately 89 free hotlines and clearinghouses that provide convenient assistance on environmental requirements.

EPA's Small Business Ombudsman Hotline can provide a list of all the hot lines and assist in determining the hotline best meeting your needs. Key hotlines include:

EPA's Small Business Ombudsman
(800) 368-5888

**Hazardous Waste/Underground Tanks/
Superfund**
(800) 424-9346

National Response Center
(to report oil and hazardous substance spills)
(800) 424-8802

Toxics Substances and Asbestos Information
(202) 554-1404

Safe Drinking Water
(800) 426-4791

**Stratospheric Ozone and Refrigerants
Information**
(800) 296-1996

Clean Air Technical Center
(919) 541-0800

Wetlands Hotline
(800) 832-7828

Continued on back

Compliance Assistance Centers

In partnership with industry, universities, and other federal and state agencies, EPA has established national Compliance Assistance Centers that provide Internet and "faxback" assistance services for several industries with many small businesses. The following Compliance Assistance Centers can be accessed by calling the phone numbers below and at their respective websites:

Metal Finishing

(1-800-AT-NMFRC or www.nmfrc.org)

Printing

(1-888-USPNEAC or www.pneac.org)

Automotive Service and Repair

(1-888-GRN-LINK or www.ccar-greenlink.org)

Agriculture

(1-888-663-2155 or www.epa.gov/oeca/ag)

Printed Wiring Board Manufacturing

(1-734-995-4911 or www.pwbr.org)

The Chemical Industry

(1-800-672-6048 or www.chemalliance.org)

The Transportation Industry

(1-888-459-0656 or www.transource.org)

The Paints and Coatings Center

(1-800-286-6372 or www.paintcenter.org)

State Agencies

Many state agencies have established compliance assistance programs that provide on-site and other types of assistance. Contact your local state environmental agency for more information. For assistance in reaching state agencies, call EPA's Small Business Ombudsman at (800)-368-5888 or visit the Small Business Environmental Homepage at <http://www.smallbiz-enviroweb.org/state.html>.

Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations, businesses may be eligible for penalty waivers or reductions. EPA has two policies that potentially apply to small businesses: The Audit Policy (<http://www.epa.gov/oeca/auditpol.html>) and the Small Business Policy (<http://www.epa.gov/oeca/>

[smbusi.html](http://www.epa.gov/oeca/smbusi.html)). These do not apply if an enforcement action has already been initiated.

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established an ombudsman ("SBREFA Ombudsman") and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. The SBREFA Ombudsman will annually rate each agency's responsiveness to small businesses. If you believe that you fall within the Small Business Administration's definition of a small business (based on your Standard Industrial Code (SIC) designation, number of employees or annual receipts, defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Your Duty to Comply

If you receive compliance assistance or submit comments to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act (SBREFA) or related provisions.